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April 1, 2005

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**CASRN 1918-02-1, 4-AMINO-3,5,6-TRICHLOROPICOLINIC ACID
PUBLICLY AVAILABLE INFORMATION TO ADDRESS EPA HPV CHALLENGE**

Dow is providing publicly available hazard information for the endpoints identified in the EPA HPV Challenge for 4-amino-3,5,6-trichloropicolinic acid. As indicated to the Agency in previous communications, this substance is a pesticide active used exclusively as an intermediate to other pesticides regulated by FIFRA in the U.S. Dow believes these conditions are sufficient to exempt this substance from the EPA HPV Challenge. Nearly five years after our request for exemption of 4-amino-3,5,6-trichloropicolinic acid from the EPA HPV Challenge, the Agency communicated our request was not accepted. November 11, 2004, Dow sent a letter to EPA stating its commitment to provide publicly available hazard information for the EPA HPV Challenge endpoints

The EPA Reregistration Eligibility Decision (RED) Document was published by the Agency in 1998 and is available on the EPA website as Case 0096: <http://cfpub.epa.gov/oppre/rereg/status.cfm?show=rereg>

The RED document includes physical and chemical properties of the active substance, CASRN 1918-02-1, as well as toxicology study results for acute, subchronic, chronic, developmental, reproductive, mutagenicity, metabolism, dermal absorption endpoints as well as epidemiological information, environmental fate and transport results, and ecological testing results in aquatic and terrestrial plants and animals.

The information provided in the RED document addresses all the endpoints within the scope of the EPA HPV Challenge and the RED document is publicly available. This submission satisfies the EPA HPV Challenge commitment to provide publicly available basic health and safety information on this substance.

We also request this substance be removed from EPA's HPV Orphans List and Annex A of the 55th ITC Report.

Sincerely,

Linda C. Burgert
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jt

cc: John Walker, USEPA Headquarters, Washington, DC